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COMMENTS TO REVISED
NATIONAL BRIDGE INSPECTION STANDARDS (NBIS)

FHWA-2000-8453-40

Application of Standards

Should the FHWA develop its own definition of a bridge for the purpose of inspecting and reporting? No opinion.

Should the FHWA definition change the way the bridge length is determined or what the minimum bridge length should be for reporting purposes? No Opinion. Shortening the length will increase the bridge inventory for bridges that require two-year inspection intervals and will add costs to the program.

Inspection Procedures

What impact will changing the underwater inspection intervals have on public authorities complying with this as an NBIS requirement? I have seen no significant channel deterioration at bridge substructures unless an unusual high water event has occurred. I concur that increasing underwater inspection intervals is prudent so long as there are provisions for intermediate inspections should high water events occur.

What, if any, impact on public authorities complying with evaluation of scour at bridges criteria within the MBIS regulation? It might provide more impetus to conduct scour evaluations on bridges.

Frequency of Inspections

Should the 4-year interval be increased so that more bridges would be eligible for the extended inspection cycle? What would be a reasonable inspection interval? What impact would this have on the safety of bridges? I believe an increase of interval greater than 4 years is acceptable but should be limited to bridges of limited use and where consequences of failure are minimized. There should be adequate documentation to ensure these limited number of bridges are affected; otherwise, the temptation might be too great to apply the extension to a larger portion of the inventory where failure consequences are great.

Qualification of Personnel

Should the individual in charge of the inspection and reporting who is a PE be required to have additional experience in bridge inspection? Yes, to give better insight into inspection procedures and findings.

Should the NBIS regulation be more specific as to the discipline of the professional engineer responsible for these bridge inspections and what impact would this change have on public authorities complying with this? Engineer in charge should be civil or structural engineer since most bridge inspection issues are structurally related. This would not affect this agency.

What impact would this change [certification training] have on public authorities complying with this? It would provide more confidence in their abilities to conduct the inspections as needed.

Should those performing underwater inspections be qualified licensed engineers? What impact would these proposed changes have on public authorities complying with this? Requiring underwater inspectors to be licensed engineers, except under unusual conditions, would be too restrictive, I believe, as there would likely be a shortage of qualified inspectors. I have found that divers experienced with underwater inspections perform adequate inspections under the direction of a qualified engineer.

Inspection Report

Should the reporting requirements for the NBIS be changed, if any, would the impact be on public authorities complying with this? I see no need to change these requirements.

Additional General Questions

No additional comments.

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HIGHWAY BRIDGE REPLACEMENT AND REHABILITATION PROGRAM
(HBRRP)

No Comments